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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

13 DANIEL ZEIGER and DANZ DOGGIE
14 DAYTRIPS, Individually and on Behalf of All
15 Others Similarly Situated,

16 Plaintiffs,

17 v.

18 WELLPET LLC, a Delaware corporation, and
19 BERWIND CORPORATION, a Pennsylvania
20 corporation,

21 Defendant.

Case No. 3:17-cv-04056-WHO

CLASS ACTION

**DECLARATION OF RAINA C.
BORRELLI IN SUPPORT OF
DEFENDANT'S ADMINISTRATIVE
MOTION TO FILE MATERIALS
UNDER SEAL**

22
23 I, RAINA C. BORRELLI, declare as follows:

24 1. I am an attorney with Gustafson Gluek PLLC and represent Plaintiffs in the above-
25 captioned matter. I submit this declaration in support of Defendant's Administrative Motion to
26 File Materials Under Seal, ECF No. 79, related to WellPet's Opposition to Plaintiffs' Motion for
27 Leave to File a Second Amended Complaint, filed under seal and redacting page 6:7-9.
28

2. Under this Court’s Protective Order, ECF No. 48, parties may identify as “Confidential” information that “is confidential pursuant to applicable law.” Pursuant to Fed. R. Civ. P. 26(b)(4)(D), consulting experts are not subject to discovery except in “exceptional circumstances.” Additionally, under the current schedule, testifying experts do not need to be disclosed at this time. Page 6:7-9, if unredacted, would identify the name of a laboratory that is a consulting expert for Plaintiffs.

3. Therefore, it is proper to file WellPet's Opposition to Plaintiffs' Motion for Leave to File a Second Amended Complaint under seal and redact page 6:7-9, which discloses the identity of Plaintiffs' consulting expert.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of June 2018.

s/ Raina C. Borrelli

 RAINA C. BORRELLI
Attorney for Plaintiffs